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Attorneys for Defendants

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**11/19/2018** at 08:00:00 AM  
Clerk of the Superior Court  
By Jessica Pascual, Deputy Clerk

**SUPERIOR COURT OF CALIFORNIA**

**COUNTY OF SAN DIEGO – CENTRAL DIVISION**

JANE DOE NOS. 1-14, inclusive,  
individuals;

Plaintiffs,

v.

GIRLSDOPORN.COM, a business  
organization, form unknown; MICHAEL J.  
PRATT, an individual; ANDRE GARCIA,  
an individual; MATTHEW WOLFE, an  
individual; BLL MEDIA, INC., a California  
corporation; BLL MEDIA HOLDINGS,  
LLC, a Nevada limited liability company;  
DOMI PUBLICATIONS, LLC, a Nevada  
limited liability company; EG  
PUBLICATIONS, INC., a California  
corporation; MIM MEDIA, LLC, a  
California limited liability company;  
BUBBLEGUM FILMS, INC., a business  
organization, form unknown; OH WELL  
MEDIA LIMITED, a business organization,  
form unknown; MERRO MEDIA, INC., a  
California corporation; MERRO MEDIA  
HOLDINGS, LLC, a Nevada limited liability  
company; and ROES 1 - 500, inclusive,

Defendants.

LEAD CASE:  
Case No. 37-2016-00019027-CU-FR-CTL

CONSOLIDATED WITH:  
Case No. 37-2017-00043712-CU-FR-CTL  
Case No. 37-2017-00033321-CU-FR-CTL

**DECLARATION OF MICHAEL PRATT  
IN SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY  
ADJUDICATION**

**Date:** February 1, 2019  
**Time:** 9:00 a.m.  
**Judge:** Hon. Joel R. Wohlfeil  
**Dept.:** C-73

Complaint Filed: June 2, 2016  
Trial Date: March 8, 2019

[IMAGED FILE]

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1 I, Michael Pratt, declare:

2 1. I am over eighteen years of age. I am a defendant in this case. I have personal knowledge  
3 of the facts stated in this declaration and, if called as a witness, could testify competently about  
4 them.

5 2. I have ownership interest in BLL Media, Inc., which owns, operates, and controls  
6 www.girlsdoporn.com, a website on which Plaintiffs allege their videos were published.

7 3. I have ownership interest in MIM Media, Inc., which owns, operates, and controls  
8 www.girlsdotoys.com, a website on which certain Plaintiffs allege their videos were published.

9 4. BLL Media, Inc. posted videos featuring the following Plaintiffs on the following  
10 approximate dates on www.girlsdoporn.com:

- 11 • Jane Doe No. 4 – October 26, 2013
- 12 • Jane Doe No. 9 – June 8, 2014
- 13 • Jane Doe No. 16 – February 20, 2015
- 14 • Jane Doe No. 17 – October 2, 2015
- 15 • Jane Doe No. 21 – June 19, 2015

16 5. I have never personally distributed the videos referenced in Plaintiffs' operative  
17 complaints.

18 6. I have never used any of the videos referenced in Plaintiffs' operative complaints for my  
19 personal commercial benefit.

20 7. I have never personally received any monies or commercial benefit from any of the  
21 videos referenced in Plaintiffs' operative complaints.

22 8. I have never personally entered into a contract with any of the Plaintiffs.

23 9. I maintain my own separate bank account. I do not share bank accounts with any of the  
24 named defendants. My personal income is deposited into my bank account. No other defendant  
25 deposits monies into my bank account to shield its income. Each entity defendant in which I  
26 have ownership interest has its own separate bank account.

27 10. I have never held myself out as being liable for the debts of any of the other defendants.

1 10. I have never held myself out as being liable for the debts of any of the other defendants.

2 I declare under penalty of perjury under the laws of the State of California that the information  
3 contained in this declaration is true and correct to the best of my knowledge.  
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5 Executed this 16<sup>th</sup> day of November, 2018 at San Diego, California.

6   
7 Michael Pratt

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